

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No. 05-30182-MAP

MICHELLE BEEBE,
Plaintiff,

v.

WILLIAMS COLLEGE,
Defendant.

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PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

Pursuant to this Court's Final Scheduling Order, dated June 22, 2007, the Plaintiff, Michelle Beebe, respectfully proposes that this Court poses the following voir dire questions to the prospective jurors:

1. What is your employment? How long have you had your present job?
What was your immediately prior job?
2. What is your education? E.g. high school grad? College?
3. What did you study in college?
4. Are you married? What is your spouse's name? What is your spouse's age? What is your spouse's employment? Level of education?
5. Have you served on jury before? What type of case(s)?
6. Have you ever taken leave under the Family Medical Leave Act (FMLA)?
7. Have you ever been denied FMLA leave by your employer?
8. Have you ever missed work due to an illness? On any of those occasions, did you see a doctor? On any of those occasions, did the doctor give you a note

excusing you from work? On those occasions, did you obey your doctor's instructions not to go to work?

9. Have you ever been disciplined at work for excessive absences? If so, please describe the circumstances and the nature of the discipline?

10. Does your employment involve managing employees in any capacity?

11. If you are in management, are you or have you been involved in deciding whether any of the employees that you manage qualify for any type of leave under the FMLA?

12. If you are in management, have you ever fired an employee for excessive absences?

13. What magazines do you subscribe to?

14. Do you have children?

15. When the children were younger and got sick, who in your family was responsible for their care? Who was responsible to be home with the child if the child was sick and needed care? Did you ever miss any work because of the need to care for a sick child?

16. Did any of your children attend day care?

17. Did you ever have to fill in for a fellow employee who was out on leave? Was it a burden to fill in for that person?

18. Have ever been unemployed for long than one month at a time? If so, what did you do to seek employment?

19 Do you understand that liquidated damages (doubling of the damages), if appropriate in this case, are not punitive, but are designed to fully compensate an employee for the loss of employment?

20. Are you connected with Williams College in any way?

Respectfully submitted,
THE PLAINTIFF, MICHELLE BEEBE,
By her attorney,

Dated: July 2, 2007

/s/ Thomas J. McCormick
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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF).

/s/ Thomas J. McCormick
Thomas J. McCormick